

UNITED STATES GOVERNMENT

Memorandum

Permits file
815-4

TO : Matt Walker, Chief, Proceedings Branch

DATE: January 29, 1973


FROM : James L. Jaffe, Proceedings Branch

SUBJECT: NPDES Permit Conditions, Standard Oil

Section 2(a) and Section 6 of the Standard Oil, Hawaii Refinery permit refers to "the application dated, June 2, 1971, including any modification thereto". If conditions are to be included by reference, the reference should be by document number and a copy of the document attached to the permit.

Section 8 of the permit provides that the Regional Administrator is to be notified in writing in the event of a breakdown of the waste treatment equipment. However, no time limit is imposed. It is suggested that a 10 or 15 day period for notification be imposed on the filing of the report as well as notification within 24 hours of the breakdown by telephone or telegraph.

Section 12 indicated that reapplication 180 days prior to expiration of this permit will allow the discharge to continue beyond the expiration of this permit. Since this is not the case, a disclaimer to the effect that reapplication does not imply that 1) the discharge may continue beyond the termination date of the permit, and 2) there is no guarantee that the reapplication will be approved.


James L. Jaffe

